

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Rodney Harvey,	)	
	)	
<i>Plaintiff,</i>	)	
	)	
-vs-	)	No. 19-cv-2996
	)	
Thomas Dart, Sheriff of Cook County,	)	Magistrate Judge Cox
and Cook County, Illinois,	)	
	)	
	)	
<i>Defendants.</i>	)	

**STATUS REPORT REGARDING SEARCH TERMS**

Pursuant to the Court's order explained on the record during a motion hearing on January 13, 2021, the parties submit the following status report:

Defendant agrees to conduct the following investigation for documents responsive to paragraph 6 of the plaintiff's second request for production.

Defendant also agreed that if the following investigation identifies documents relevant to any party's claim or defense that the document will be produced to plaintiff.

1. Defendant will inquire with Cook County Health and Hospital System Human Resources regarding any documents relative to "all documents showing attempts to retain an oral surgeon to work at the Cook County Jail from January 2016 to the present."

2. Defendant Cook County reported that the only search term proposed by plaintiff on December 17, 2020 that was overbroad is a search of Dr. Jorelle Alexander's e-mail account using the term "omfs." Defendant Cook County agreed to produce, by January 22, 2021, e-mails from Dr. Alexander's account responsive to the following terms:

Dr. Jorelle Alexander's e-mails (and attachments) responsive to the following search terms from January 1, 2016 to the present:

- a. "oral surgeon";
- b. "part time oral surgeon";
- c. "part-time oral surgeon";
- d. "digital xray";
- e. "digital x-ray";
- f. "panoramic xray";
- g. "panoramic x-ray"; or
- h. "surgical drills."

3. Defendant Cook County agreed to search the following e-mails accounts based on the following search terms:

Dr. Jorelle Alexander's e-mails (and attachments) responsive to the following search terms from January 1, 2016 to present:

- a. "oral surgery" and "wait";
- b. "omfs" and "wait";
- c. "oral surgery" and "delay";
- d. "omfs" and "delay";
- e. "cermak" and "transport";
- f. "DOJ" and "OMFS";
- g. "justice" and "part-time";
- h. "DOJ" and "part-time" ;
- i. "justice" and "part time" ;

- j. "DOJ" and "part time"; or
- k. "Cermak" and "transportation"

From January 1, 2016 to the present, e-mails (and attachments) between Dr. Jorelle Alexander and Dr. Mohammad Qaisi responsive to the following search terms:

- a. "justice" and "part-time";
- b. "DOJ" and "part-time";
- c. "justice" and "part time";
- d. "DOJ" and "part time";
- e. "Cermak" and "oral surgeon"
- f. "Cermak" and "oral surgeon" and "part-time";
- g. "Cermak" and "oral surgeon" and "part time"; or
- h. "transportation" and "surgery"

From January 1, 2016 to the present, e-mails to and from Dr. Claudia Fegan responsive to the following search terms:

- a. "Cermak" and "oral surgeon";
- b. "jail" and "oral surgeon";
- c. "Cermak" and "oral surgery" and "transportation";
- d. "jail" and "oral surgery" and "transportation";
- e. "Cermak" and "oral surgery" and "justice";
- f. "Cermak" and "oral surgery" and "DOJ";
- g. "Cermak" and "transportation" and "oral"; or
- h. "jail" and "transportation" and "oral"

Respectfully submitted,

<u>/s/Patrick Morrissey</u> Thomas G. Morrissey, Ltd. 10150 S. Western Ave. Chicago, IL 60643 <i>An attorney for plaintiff</i>	<u>/s/ Lisa McElroy</u> (with consent) JOHNSON & BELL, LTD. 33 W. Monroe Street, Suite 2700 Chicago, IL 60603 An attorney for Defendants
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